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June 28, 2023

By ECF

Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

In Re: Jarrett Payne, et al. v. City of New York, et al.
No. 20 Civ. 8924 (CM) (GWG)

Your Honor:

I am a Senior Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and I am among counsel for the defense in the above-referenced matter. This Office writes to respectfully suggest that the Court provide Officer Majer Saleh with an enlargement of time to answer or otherwise respond to the Second Corrected Amended Complaint, to July 10, 2023. This is the first such request, and no other dates should be affected by this request. Plaintiffs' counsel consents to this request.

By way of background, plaintiffs filed the Second Corrected Amended Complaint naming Saleh as a defendant on April 25, 2023. *See* Docket Entry No. 957. Plaintiffs then filed an Affidavit of Service on June 12, 2023, which stated that Officer Saleh was served on June 8, 2023. *See* Docket Entry No. 1052. This means Saleh's time to respond to the Second Corrected Amended Complaint is June 29, 2023.

This Office does not represent Saleh and the main reason for seeking an enlargement of time is to preserve Saleh's defenses while he seeks legal representation. His attorney will then need time to satisfy their obligations under Fed. R. Civ. P. 11 in order to adequately respond to the Second Corrected Amended Complaint.

For the reasons set forth herein, this Office respectfully suggests that the Court enlarge the time for Officer Saleh to answer or otherwise respond to the Corrected Second Amended Complaint on behalf of Officer Saleh until July 10, 2023.

Thank you for your consideration herein.

Respectfully submitted,

Joseph M. Hiraoka, Jr. s/

Joseph M. Hiraoka, Jr.

Senior Counsel

Special Federal Litigation Division

cc: ALL COUNSEL (*via* ECF)